



CITY OF *Caldwell, Idaho*

October 22, 2025

JAROM WAGONER
Mayor

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For a list of the City
Council members, visit:
Website
www.cityofcaldwell.org

Idaho Dept of Environmental Quality
C/O Drinking Water Section
1410 N Hilton
Boise, ID 83706

To Whom It May Concern:

The City of Caldwell staff have reviewed the draft of proposed modifications to IDAPA 58.01.08, rule 552.01.b.v., regarding static pressure within a public water distribution system. We wish to express appreciation that Idaho DEQ is making this revision available for comment.

Revision 1:

All PWSs must keep static pressure within portions of the distribution system that have any service connections below one hundred (100) psi and keep static pressure at service connections below eighty (80) psi.

Response:

The main and the “service connection” *at the main* will have the same pressure. There would be no pressure distinction between the two. Rather, if the service connection pressure is determined behind the water meter (private side), then this is a space governed by plumbing code and does not fall under the jurisdiction of the PWS.

Revision 2:

If static pressure at a service connection exceeds 80 psi the Department may approve the use of pressure-reducing devices for individual service connections on a case-by-case basis, [...]

Response:

The public-private jurisdictional boundary in Idaho, generally, is the water meter. Generally, a pressure reducing device would be placed on the private side of the water service. This is a space governed by plumbing code. With respect to the structure of local government, the plumbing permit to install such device would pass through the building department *rather than* the PWS, its operators, or even any portion of a Public Works Department. Therefore, the language is problematic because the private side is governed by plumbing code and the PWS is governed by DEQ rule.

“The Treasure of the Valley”



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Revision 3:

If PWS modification will cause pressure to routinely exceed eighty (80) psi the PWS owner must notify affected customers. [...]

Response:

We think this language could be clarified a bit to prevent a variety of interpretations. Please consider the following:

Any new or substantially modified PWS area should ordinarily maintain a maximum pressure of 100 psi, where it is feasible to meet the pressure requirements as part of the material modification, measured prior to the structure or facility connected to the PWS, intended to be used for domestic purposes (service connections).

We think it is responsible to notify customers of pressure fluctuations with the potential to impact the integrity and functionality of private plumbing and fixtures. We desire that the notification demands are not unnecessarily stringent for *existing* residences/facilities which are functional at an elevated pressure range.

Thank you for the opportunity to provide feedback.

Sincerely,

Ashley Newbry, PE
Deputy Public Works Director (Water)

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